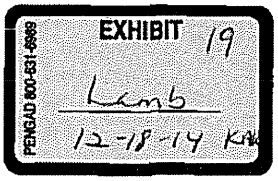


April 7, 2013

My name is Lisa Lamb and I've been an employee of Rockwell for 25 years. I was in IT until just over a year ago when I accepted a position in Mary Ward's Controls organization reporting to Sharon Clement. I have a Legacy support background, so I had a great deal to learn about SAP and role based security when I joined the team, but was told that was understood and not a problem.

A few months into the job, I began detecting overall turmoil on the team, then learned there was a history of friction between Sharon and her former staff that resulted in them being forced out or let go.

It soon became clear that a major source of this turmoil was the open IC-CATs (Internal Control - Corrective Action Tracking System) records assigned to Sharon to resolve thousands of SOD (Segregation of Duty) conflicts held by IT users in IFS and SAP. Given the IC-CAT deadlines were approaching and she had just forced the only person with conflict resolution expertise to quit, Sharon seemed fearful she would again have to tell Controls Senior management she had been unable to resolve the SOD conflicts and therefore unable to close the IC-CATs.

What follows is a detailed account of what appeared to be desperate steps taken by Sharon Clement, where she knowingly violated several Department policies in an attempt to close an IC-CAT on time.

In short, Sharon made unapproved changes to the rules in Rockwell's GRC/RAR tool that are used to identify SOD conflicts for SAP users, then falsely documented the reason for the change. Not only do I believe her actions were a **violation of Rockwell ethics with potential significant impact to the organization** (see IC-CAT 11996), but also believe they're a factor in my job being unfairly jeopardized.

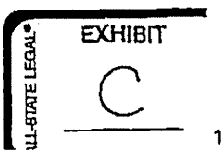
Although Audit did discover the changes and took action, I believe the consequences, if any, were minimal. What was upsetting for me was being put in the middle and instructed to make changes I felt were incorrect and being rushed through for all the wrong reasons. What I don't understand is why Sharon's manager seemed to look the other way.

In January of 2013, PwC provided Rockwell with a list of SAP t-codes that are missing from our rules. I have been tasked to investigate this, and now fear I will be held accountable for t-codes that are missing from our rules. I feel that is not right.

All I want is to be given a chance to learn and to do the best job possible like I always do. However, I now find myself in what feels like a hopeless situation that I feel is very unfair. What's worse is I recently learned Sharon wants to have me fired, which will no doubt provide her a new scapegoat to blame for things not getting done. This situation has left me no choice but to use the EIR process, which I have already started. Please see my attached document "Lisa E Lamb – documentation 3-31-2013" for details regarding that.

Please know that I have never been faced with anything like this and wish I weren't. It's both exhausting and time consuming. However, I do believe Rockwell's management genuinely cares about having employees of high moral and ethical standards, or I would not have written this.

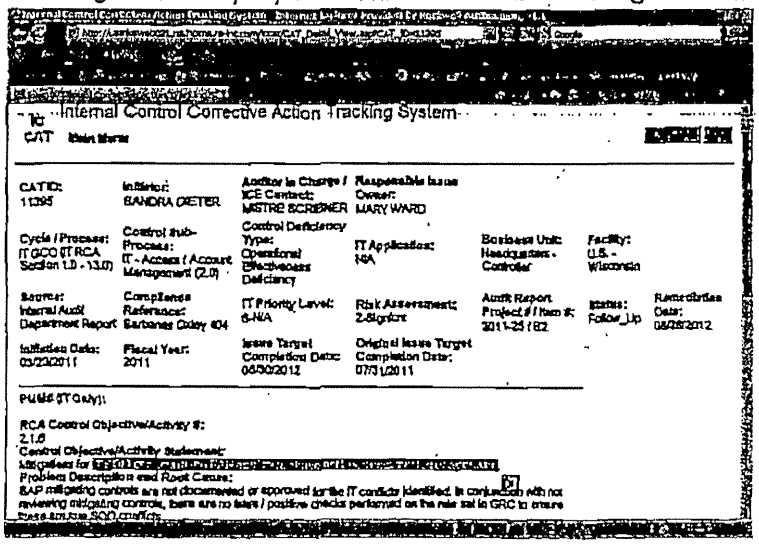
Thank you for your time, and keeping this matter as confidential as possible.



Sincerely,
Lisa Lamb

Sequence of events with screen prints and details

On 3/23/2011, IC-CAT 11395 was opened to Resolve the almost 18,000 high risk SOD conflicts that existed for the IT SAP Basis and Security administrators. A Risk assessment of Level 2/significant was assigned to 11395 and a Target date of 6/30/2012. Sharon Clement was assigned to 11395 to resolve


Internal Control Corrective Action Tracking System

CAT

CATID: 11395
Initiator: SANDRA OETER
Auditor in Charge / ICE Contact: MISTIE SCRIBNER
Responsible Issue Owner: MARY WARD
Cycle / Process: IT GCO (IT RCA Section 1.0 - 13.0)
Control Sub-Process: IT - Access / Account Management (2.0)
Control Deficiency Type: Operational Effectiveness Deficiency
IT Application: N/A
Business Unit: Headquarters - Controller
Facility: U.S. - Wisconsin
Source: Internal Audit Department Report
Compliance Reference: Sarbanes Oxley 404
IT Priority Level: 6-N/A
Risk Assessment: 2-Significant
Audit Report Project # / Item #: 2011-25 / 82
Status: Follow_Up
Remediation Date: 06/29/2012
Initiation Date: 03/23/2011
Fiscal Year: 2011
Issue Target Completion Date: 06/30/2012
Original Issue Target Completion Date: 07/31/2011

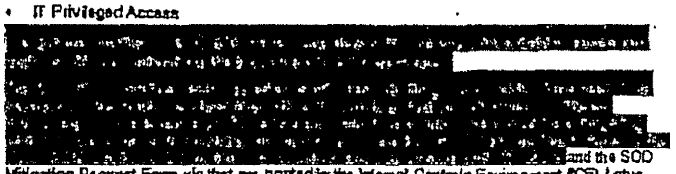
RCA Control Objective/Activity #:
2.1.6
Control Objective/Activity Statement:
Problem Description and Root Cause:
SAP mitigating controls are not documented or approved for the IT conflicts identified. In conjunction with not reviewing mitigating controls, there are no basis / positive checks performed on the role set in GRC to ensure these are true SOD conflicts

Verbiage from the Internal Controls Procedure_V5.doc that is documented in Policy IQ

6.6 SEGREGATION OF DUTIES (SOD)

6.6.1 A fundamental element of Internal Control is the segregation of certain key duties. The basic idea underlying SOD is that no employee or group of employees should be in a position both to perpetrate and to conceal errors or fraud in the normal course of their duties. Basic categories of SOD are as follows:

- Custody of Assets
- Authorization / approval of related transactions affecting those assets
- Recording or reporting of related transactions
- IT Privileged Access


and the SOD Mitigation Request Form.xls that are posted in the Internal Controls Environment (ICE) Lotus Notes Database.)

The basic components of the SOX PMO Control Team's efforts to monitor SOD compliance are as follows:

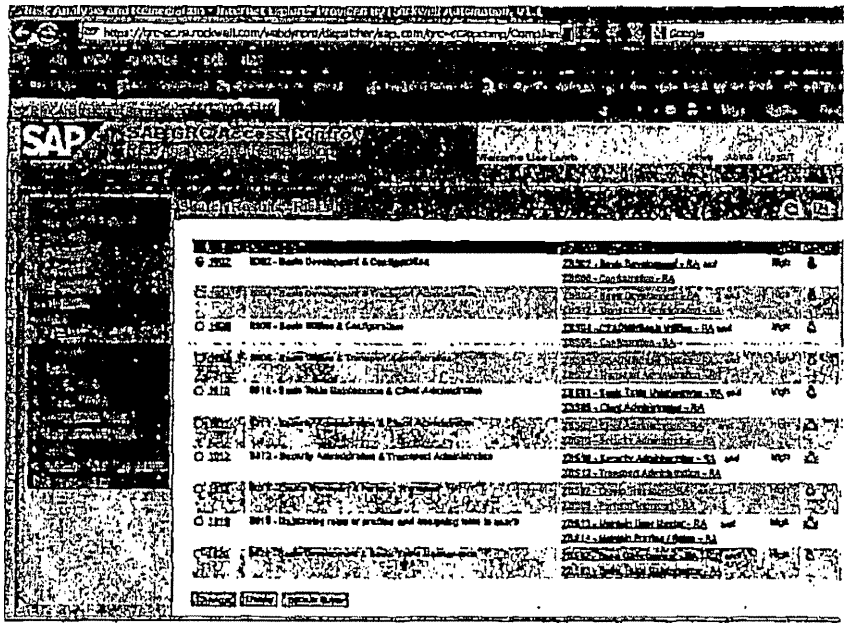
- Reviews are conducted at least annually to determine the level of SOD exposure at a given time and to assist with our SOX compliance efforts.
- New roles and changes to existing roles need to be approved by the SOX PMO Controls Team to determine whether the changes result in additional SOD risk.
- SOD applies to all functions, regardless of application.

6.7 MITIGATING CONTROLS

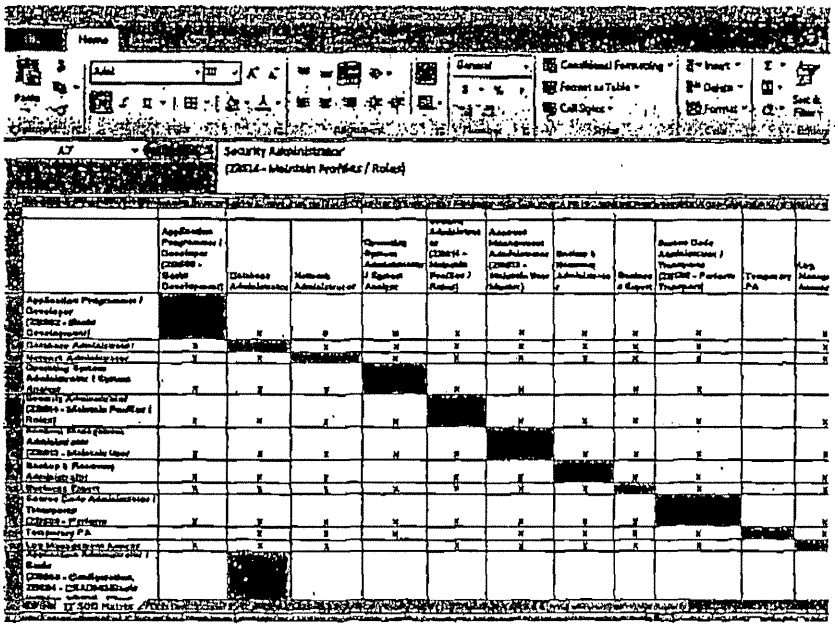
The Rules in our GRC/RAR tool are read whenever an analysis is run to evaluate SOD conflicts . These rules were developed years ago by taking the SAP recommended rules, then adjusting them to identify risk as it pertains to Rockwell business processes and areas of job responsibility. As a result, a Corporate IT SOD Matrix and Job Description matrix was established that documents who can have what types of access based on job role.

Sample of the risks that build SOD rules in RAR. Note the status column on the far right

that indicates whether or not the Risks are Active



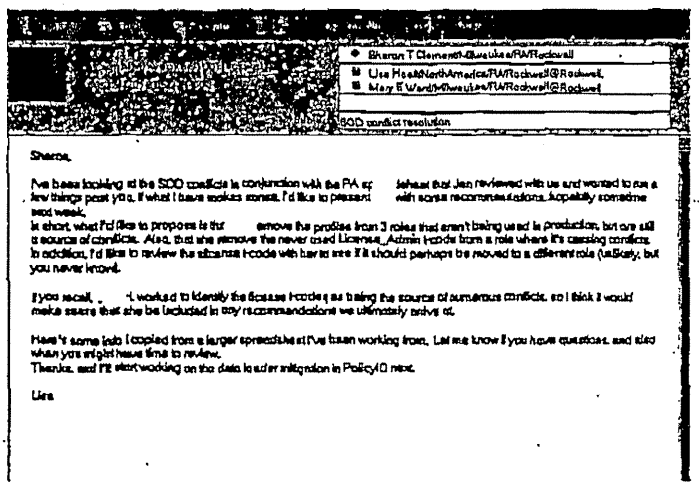
Corporate IT SOD Matrix and Job Description Matrix



The SOD identified in 11395 come from conflicts the IT SAP Basis and Security Administrators have because they either have roles assigned to them that contain SAP t-codes they should not have –or- despite the conflicts, must have to provide support, meaning that access must be mitigated.

Occasionally, a "Permission" on a rule will modified or disabled if it's learned the Permission is not relevant or something in the environment has changed. However, that's not the norm. In cases where Admins have t-code access they should not (the vast majority), the resolution is to either revoke access from roles that contain those t-codes –or- request IT to change the roles to make the t-codes read only vs update –or- move the t-codes to roles that are only by FireFighter IDs.

In May of 2012, Sharon be ne increasingly anxious knowing the t t date on 11395 was fast approaching and tasked me to resolve the conflicts. Working with , we identified the source of the conflicts. I suggested to Sharon that revoking inappropriate role access we found and making role changes, including the removal of a SAP Licensing t-code from a Basis role that shouldn't have it, would reduce the conflicts down to a fraction.


Sharon T Clement-Milwaukee/RA/Rockwell
Lisa Hoel/NorthAmerica/RA/Rockwell@Rockwell,
Mary E Ward/Milwaukee/RA/Rockwell@Rockwell
SOD conflict resolution

Sharon,

I've been looking at the SOD conflicts in conjunction with the PA sy ... latest that Jen reviewed with us and wanted to run a few things past you. If what I have makes sense, I'd like to present with some recommendations hopefully sometime next week.
In short, what I'd like to propose is that remove the profiles from 3 roles that aren't being used in production, but are still a source of conflicts. Also, that she remove the never used License_Admin tcode from a role where it's causing conflicts. In addition, I'd like to review the sbcensa tcode with her to see if it should perhaps be moved to a different role (unlikely, but you never know).

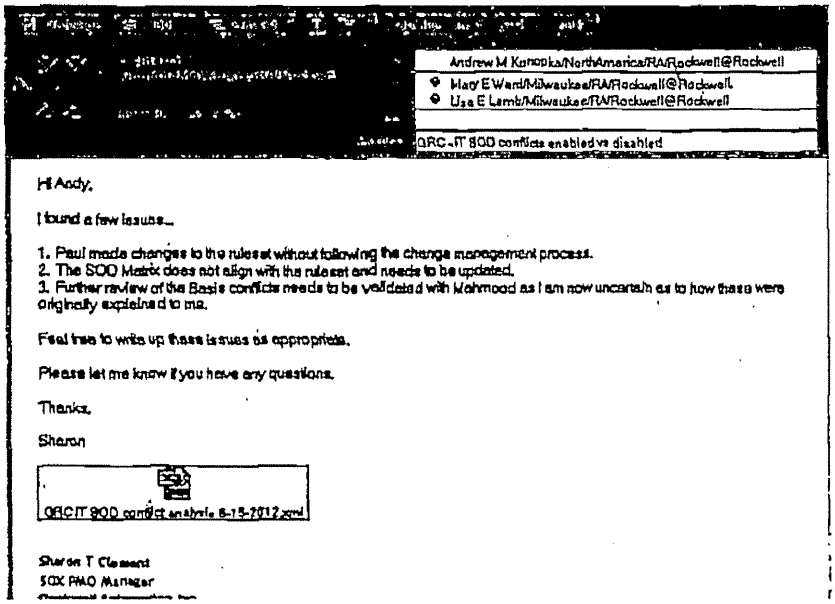
If you recall, I worked to identify the 6 case tcodes as being the source of numerous conflicts, so I think it would make sense that she be included in any recommendations we ultimately arrive at.

Here's some info I copied from a larger spreadsheet I've been working from. Let me know if you have questions, and also when you might have time to review.
Thanks, and I'll start working on the data load migration in Policy10 next.

Lisa

Sharon rejected our recommendations, assuming because role changes often take weeks to complete and would likely not make the June 30th deadline. That was discouraging and really didn't make sense.

Sharon was angry with me and decided to pursue other options on her own. She tried to make a case with Audit that the rules needed to be changed in order to correct unauthorized changes made by the person I replaced, which was an unfounded accusation.


Andrew M Konopka/NorthAmerica/RA/Rockwell@Rockwell
Mary E Ward/Milwaukee/RA/Rockwell@Rockwell
Lisa E Lamb/Milwaukee/RA/Rockwell@Rockwell
ORC-IT SOD conflicts enabled vs disabled

Hi Andy,

I found a few issues...

1. Paul made changes to the ruleset without following the change management process.
2. The SOD Matrix does not align with the ruleset and needs to be updated.
3. Further review of the Basis conflicts needs to be validated with Mahmood as I am now uncertain as to how these were originally explained to me.

Feel free to write up these issues as appropriate.

Please let me know if you have any questions.

Thanks,

Sharon

ORC IT SOD conflict analysis 8-15-2012.xml

Sharon T Clement
SOX PMO Manager

[redacted]

{In Archive} Re: GRC - IT SOD conflicts enabled vs disabled
Mary E Ward to: Andrew M Konopka 08/18/2012 07:35 AM
Cc: Sharon T Clement, Lisa E Lamb Show Details

Sharon, Andy,

When were these "unapproved" changes made? My quarterly review of changes would have caught any changes that did not have an approval associated with them.

Thanks,
Mary

Andrew M Konopka [redacted]

From: Andrew M Konopka/NorthAmerica/RA/Rockwell
To: Sharon T Clement/Milwaukee/RA/Rockwell@Rockwell
Cc: Lisa E Lamb/Milwaukee/RA/Rockwell@Rockwell, Mary E Ward/Milwaukee/RA/Rockwell@Rockwell
Date: 08/18/2012 04:44 AM
Subject: Re: GRC - IT SOD conflicts enabled vs disabled

Hi Sharon

Yes these issues were all part of today's discussion based on our discussions last week. I thought that all changes in the RAR log were approved and then reviewed quarterly – are you stating that these changes were unauthorized and undetected during the review?

Andy

Andrew Konopka
Project Manager IT Audit
[redacted]

When her claims were rejected by Mary Ward and Andy Konopka, Sharon then scheduled a meeting with [redacted] to solicit his input as to which risks were causing the most SOD conflicts. However, when she asked him to validate the proposed changes, he would not respond back and it was from these email correspondence that I learned I would be the one making changes in RAR. This was upsetting to me.

[redacted]

Lisa E Lamb/Milwaukee/RA/Rockwell@Rockwell
Mary E Ward/Milwaukee/RA/Rockwell@Rockwell
Fw: Basis SOD Conflicts in RAR

Lisa,

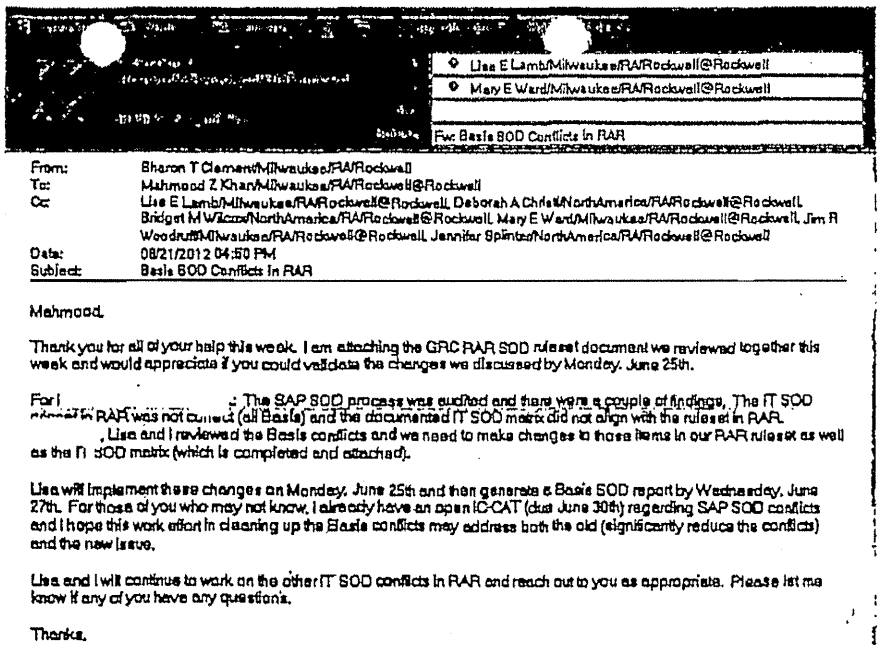
I have not heard back from [redacted] on these changes. Please implement these changes in RAR and generate a new Basis only report by Wednesday, June 27th.

Please let me know if you have any questions.

Thank you,

Sharon

Sharon T Clement
SOX RMO Manager
Rockwell Automation, Inc.
1201 South 2nd Street
Milwaukee, WI 53204-2496
Phone / Fax +1 (414) 382-1287 / +1 (414) 382-8434
e-mail: stclement@ra.rockwell.com



Lisa E Lamb/Milwaukee/RA/Rockwell@Rockwell
Mary E Ward/Milwaukee/RA/Rockwell@Rockwell
Fw: Basis SOD Conflicts in RAR

From: Sharon T Clement/Milwaukee/RA/Rockwell
To: Mahmood Z Khan/Milwaukee/RA/Rockwell@Rockwell
Cc: Lisa E Lamb/Milwaukee/RA/Rockwell@Rockwell, Deborah A Christ/NorthAmerica/RA/Rockwell@Rockwell, Bridget M Wilcox/NorthAmerica/RA/Rockwell@Rockwell, Mary E Ward/Milwaukee/RA/Rockwell@Rockwell, Jim R Woodruff/Milwaukee/RA/Rockwell@Rockwell, Jennifer Spinter/NorthAmerica/RA/Rockwell@Rockwell
Date: 08/21/2012 04:50 PM
Subject: Basis SOD Conflicts in RAR

Mahmood,

Thank you for all of your help this week. I am attaching the GRC RAR SOD ruleset document we reviewed together this week and would appreciate if you could validate the changes we discussed by Monday, June 25th.

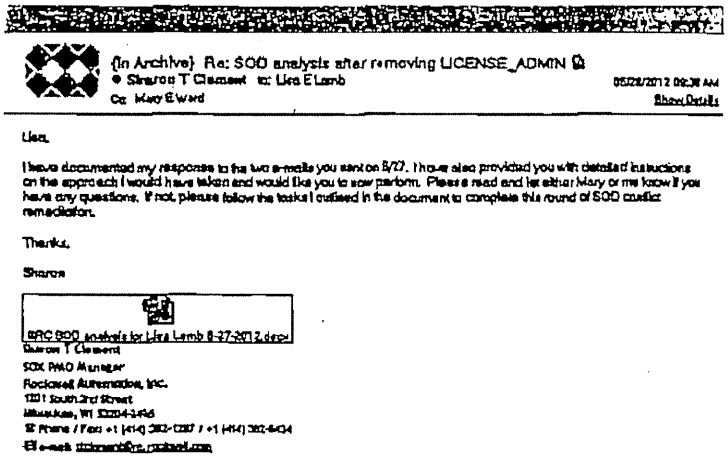
For [redacted]: The SAP SOD process was audited and there were a couple of findings. The IT SOD [redacted] RAR was not current (all Basis) and the documented IT SOD matrix did not align with the ruleset in RAR. [redacted], Lisa and I reviewed the Basis conflicts and we need to make changes to those items in our RAR ruleset as well as the IT SOD matrix (which is completed and attached).

Lisa will implement these changes on Monday, June 25th and then generate a Basis SOD report by Wednesday, June 27th. For those of you who may not know, I already have an open IC-CAT (due June 30th) regarding SAP SOD conflicts and I hope this work effort in cleaning up the Basis conflicts may address both the old (significantly reduce the conflicts) and the new issue.

Lisa and I will continue to work on the other IT SOD conflicts in RAR and reach out to you as appropriate. Please let me know if any of you have any questions.

Thanks,

I tried to provide input, which only further infuriated Sharon, making it impossible to explain that her proposed changes weren't properly approved, nor would they resolve very many conflicts.



{In Archive} Re: SOD analysis after removing LICENSE_ADMIN
Sharon T Clement to: Lisa E Lamb
Cc: Mary E Ward
05/28/2012 09:38 AM
Show Details

Lisa,

I have documented my response to the two e-mails you sent on 5/27. I have also provided you with detailed instructions on the approach I would have taken and would like you to now perform. Please read and let either Mary or me know if you have any questions. If not, please follow the tasks I outlined in the document to complete this round of SOD conflict remediation.

Thanks,

Sharon

GRC SOD analysis for Lisa Lamb 5-27-2012.docx

Sharon T Clement
SOX PMO Manager
Rockwell Automation, Inc.
1201 South 2nd Street
Milwaukee, WI 53204-2496
Phone / Fax +1 (414) 382-0287 / +1 (414) 382-4404
E-mail: stclement@ra.rockwell.com

Lisa,

My approach to reduce the SOD conflicts would have be[illegible] different than the one you took.

1. To ensure we have valid SOD data, I would have made the risk changes to the qaspt first. My initial e-mail was sent on 6/21 to which I received no feedback from IT. I then requested you to make these changes on 6/25 and generate a SOD Basis only report by 6/27.
2. While we spoke about SI_license and License_Admin potentially being a quick hit, I would have fixed the qaspt first to see if that would still be an issue.
3. If you would have run the SOD Basis only analysis after fixing the qaspt, the potential reduction in the SOD conflicts would have been 750+. I used the SOD_User_Analysis_05072012_03_Summary_Post R6 report to determine this change.
4. If you received more feedback from Mahmood and Deb, I was not copied on those e-mails. That being said if ZS_BC_SECURITY-ADMIN-PROD had read-only access to License_Admin, I would assume Deb already communicated that to you so I don't understand why she needed to send you another e-mail today.
5. If you find through your analysis that roles with SOD conflicts which are not being used, then you need to send a separate e-mail to the role owner and inform them of such and request they submit a ticket to have those roles removed or explain to you why they want to keep them as we will need to continue to remediate the SOD conflict.
6. I agree with Mahmood that his team needs both SI_license and License_Admin. His Basis team is responsible for maintaining the SAP licenses. As such, I would not recommend using a FF ID but would recommend mitigating that risk. I would work with Mahmood to determine what other controls are in place (i.e., client must be open, etc.) and then enter a mitigation in ProtiviTi and RAR. That way, if any other role would gain access to update or change the license, it would show up in our SOD quarterly reports.
7. The License_Admin may only be used annually or only when we do an upgrade – Google this and read what is involved with regards to keeping your SAP licenses current. Depending on how often we make SAP license changes, this may not show up in Pro Se Taylor as they do not have a full year of log files they are analyzing.
8. If you want to test a theory and disable something in the qaspt, you do so and then perform a simple single user SOD report to determine if your theory was right. You do not need to run a complete SOD report which takes a long time.
9. Given the above information on License_Admin, I would not have pursued this any further and looked at the SI_license conflict, which I did. In reviewing the SOD_User_Analysis_05072012_03_Summary_Post R6 report, it was obvious there were many conflicts so I filtered the report to show me any conflict (either way) in column E – Conflicting Action. In column F – Risk Description, I could see that the Maintain User Master function had numerous conflicts with Basis Functions. Given that information, I logged into SAP ECC and used SUIM to see what Deb's team had in ZS_BC_SECURITY-ADMIN-PROD for SI_license and determined that for SI_license (System Authorizations) there were two lines of authorizations that were active, one having an astedsk (*) which means they have more than display access (see the screen below where all auth objects are assigned). Removing the * could potentially remove more than 1,800+ conflicts.
10. I think your last point (#5) refers to my first point... fix the qaspt and then work with the SI_license and License_Admin conflicts.

Changes to the Risks in RAR

Out of time, and because Sharon does not have authorization to make changes in the RAR tool, she instructed me to change the rules before the IC-CAT deadline of June 30th.

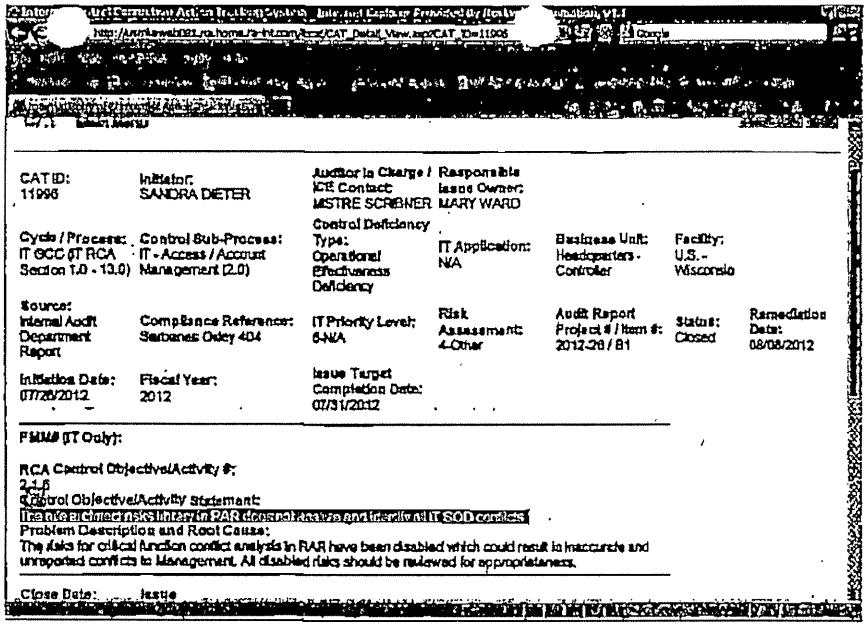
I told both Sharon and Mary that I was not comfortable making these changes, but I was requested to make them anyway.
On 6/28/2012, I logged into RAR and changed the status on most of the SAP Basis Risks. I did not like that my UserID would be permanently tied to those changes in RAR and felt I'd eventually become another scapegoat for blame like [illegible] had become.

As expected, trying to manipulate the SOD by adjusting the Risk status did not significantly reduce the number of conflicts like Sharon thought.

Also, I do not believe Sharon anticipated Internal Audit would notice the changes and come ask her about them.

AUDIT Findings

Andy Konopka immediately opened 2 IC-CATs.
The first, 11996, because the changes made 6/28 left RAR with a set of rules that no longer can analyze and identify all of the SOD conflicts.



CAT ID:	Initiator:	Auditor In Charge / ICE Contact:	Responsible Issue Owner:			
11996	SANDRA DIETER	MISTRE SCRIBNER	MARY WARD			
Cycle / Process:	Control Sub-Process:	Control Deficiency Type:	IT Application:	Business Unit:	Facility:	
IT GCC (IT RCA Section 1.0 - 13.0)	IT - Access / Account Management (2.0)	Operational Effectiveness Deficiency	N/A	Headquarters - Controller	U.S. - Wisconsin	
Source:						
Internal Audit Department Report	Compliance Reference: Sarbanes Oxley 404	IT Priority Level: 6-N/A	Risk Assessment: 4-Other	Audit Report Project # / Item #: 2012-28 / B1	Status: Closed	Remediation Date: 08/08/2012
Initiation Date:	Fiscal Year:	Issue Target Completion Date:				
07/26/2012	2012	07/31/2012				

FMM# (IT Only):

RCA Control Objective/Activity #:
2.1.6
Control Objective/Activity Statement:
The rule architect risks library in RAR does not analyze and identify all IT SOD conflicts
Problem Description and Root Cause:
The risks for critical function conflict analysis in RAR have been disabled which could result in inaccurate and unreported conflicts to Management. All disabled risks should be reviewed for appropriateness.

Close Date: Issue

The second, 11997, to address the fact the SOD matrix no longer aligned with the rules in RAR.

Under any other circumstances this would have been considered a significant violation in Change Management procedures subject to disciplinary action.

RCA Control Objective/Activity #:
2.1.6
Control Objective/Activity Statement:
The rule architect risks library in RAR does not analyze and identify all IT SOD conflicts
Problem Description and Root Cause:
The risks for critical function conflict analysis in RAR have been disabled which could result in inaccurate and unreported conflicts to Management. All disabled risks should be reviewed for appropriateness.

Close Date: 10/23/2012
Issue Approver/Reviewer: ANDREW KONOPKA

Closing Comments:
8/8/12 sad: Per S.Clement - Issues is complete and ready for final review/closure by Internal Audit.

Associated Files:

Click on a file below to download/view.
11996_RAR_Risk_Change_History_Results_from_6-28-2012_.pdf
11996_GRC_IT_SOD_conflict_analysis_6-15-2012.xml
11996_Corporate_IT_SOD_Matrix_and_Job_Descriptions_-_FY12_v8-7-12.xls

SHARON CLEMENT	07/31/2012	07/26/2012	08/08/2012	Complete

Escalation Level 1: MARY WARD
Escalation Level 2: DAVID DORGAN

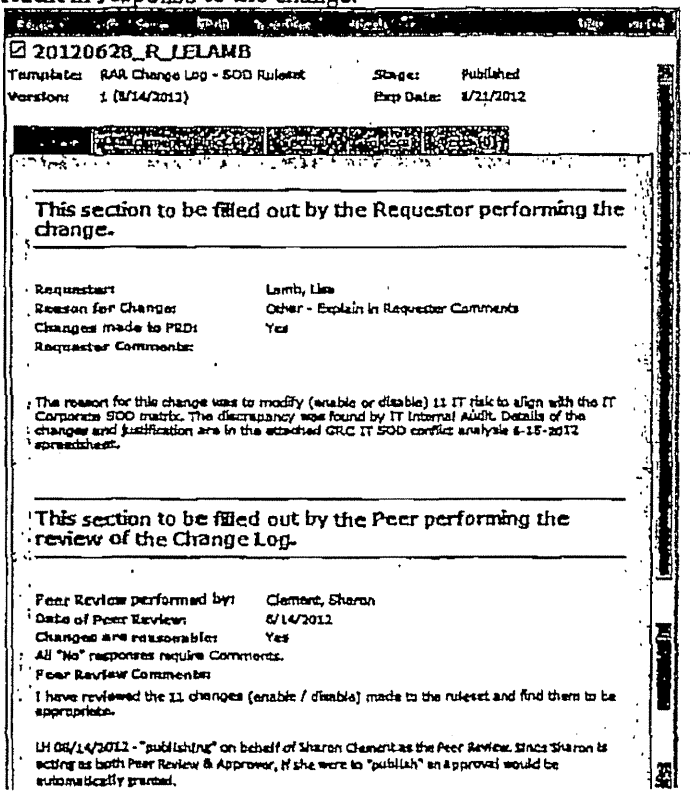
Action To Be Taken: Review the IT rules set in RAR and update the risks as appropriate.

Action Performed: 8/7/2012 stc: Eleven IT risks have been updated (enabled or disabled) to align with the IT Corporate SOD matrix (see IT Corporate SOD Matrix and GRC IT SOD analysis 6-15-2012 documents attached. Also attached is the change log for the 11 risks modified the ruleset.

POLICYIQ violations

On 8/7, Sharon asked me to create a RAR Change Log record in PolicyIQ that's required by R&C change management procedures where she made herself both the Peer Reviewer and the Approver of the Change Log which is in violation of the Change procedure.

Sharon did not like the Description I provided because it accurately described of the change events and had me change it with verbiage she provided. Verbiage that was not only misleading but simply false.
The changes made on 6/28 were not done to align with the SOD matrix. The matrix had to be updated in response to one of the IC-CATs opened by Audit in response to the change.



20120628_R_LELAMB

Template: RAR Change Log - SOD Ruleset
Stage: Published
Version: 1 (8/14/2012)
Exp Date: 8/21/2012

This section to be filled out by the Requestor performing the change.

Requestor: Lamb, Lisa
Reason for Change: Other - Explain in Requester Comments
Changes made to PRD: Yes
Requester Comments:

The reason for this change was to modify (enable or disable) 11 IT risk to align with the IT Corporate SOD matrix. The discrepancy was found by IT Internal Audit. Details of the changes and justification are in the attached GRC IT SOD conflict analysis 6-15-2012 spreadsheet.

This section to be filled out by the Peer performing the review of the Change Log.

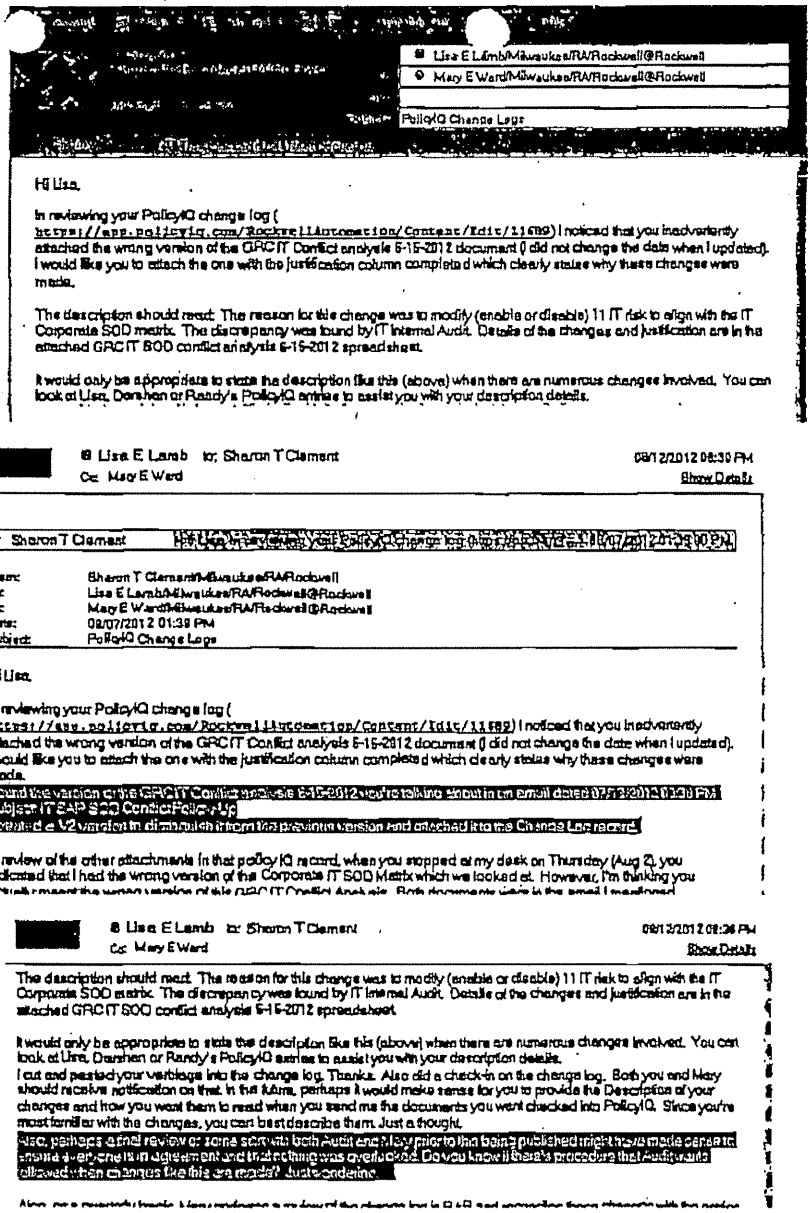
Peer Review performed by: Clement, Sharon
Date of Peer Review: 8/14/2012
Changes are reasonable: Yes
All "No" responses require Comments.
Peer Review Comments:

I have reviewed the 11 changes (enable / disable) made to the ruleset and find them to be appropriate.

LH 08/14/2012 - "publishing" on behalf of Sharon Clement as the Peer Review. Since Sharon is acting as both Peer Review & Approver, if she were to "publish" an approval would be automatically granted.

Sharon also had me replace the original SOD matrix attached to the Change Log with a version that was updated after the change was made. Another misleading and false representation of the actual events.

I questioned Sharon in an email response about Matrix and also suggested that given the nature of this change, that Audit be one of the approvers of the RAR Change Log in PolicyIQ. My suggestion was ignored.



Lisa E Lamb/Milwaukee/RA/Rockwell@Rockwell
Mary E Ward/Milwaukee/RA/Rockwell@Rockwell
PolicyIQ Change Logs

Hi Lisa,

In reviewing your PolicyIQ change log (https://app.policyiq.com/RockwellAutomation/Content/Edit/11689) I noticed that you inadvertently attached the wrong version of the GRC IT Conflict analysis 6-15-2012 document (I did not change the date when I updated). I would like you to attach the one with the justification column completed which clearly states why these changes were made.

The description should read: The reason for this change was to modify (enable or disable) 11 IT risk to align with the IT Corporate SOD matrix. The discrepancy was found by IT Internal Audit. Details of the changes and justification are in the attached GRC IT SOD conflict analysis 6-15-2012 spread sheet.

It would only be appropriate to state the description like this (above) when there are numerous changes involved. You can look at Lisa, Darshan or Randy's PolicyIQ entries to assist you with your description details.

Lisa E Lamb to: Sharon T Clement
Cc: Mary E Ward
08/13/2012 08:30 PM
Show Details

Sharon T Clement [redacted]

From: Sharon T Clement/Milwaukee/RA/Rockwell
To: Lisa E Lamb/Milwaukee/RA/Rockwell@Rockwell
Cc: Mary E Ward/Milwaukee/RA/Rockwell@Rockwell
Date: 08/07/2012 01:39 PM
Subject: PolicyIQ Change Logs

Hi Lisa,

In reviewing your PolicyIQ change log (https://app.policyiq.com/RockwellAutomation/Content/Edit/11689) I noticed that you inadvertently attached the wrong version of the GRC IT Conflict analysis 6-15-2012 document (I did not change the date when I updated). I would like you to attach the one with the justification column completed which clearly states why these changes were made.

[redacted]

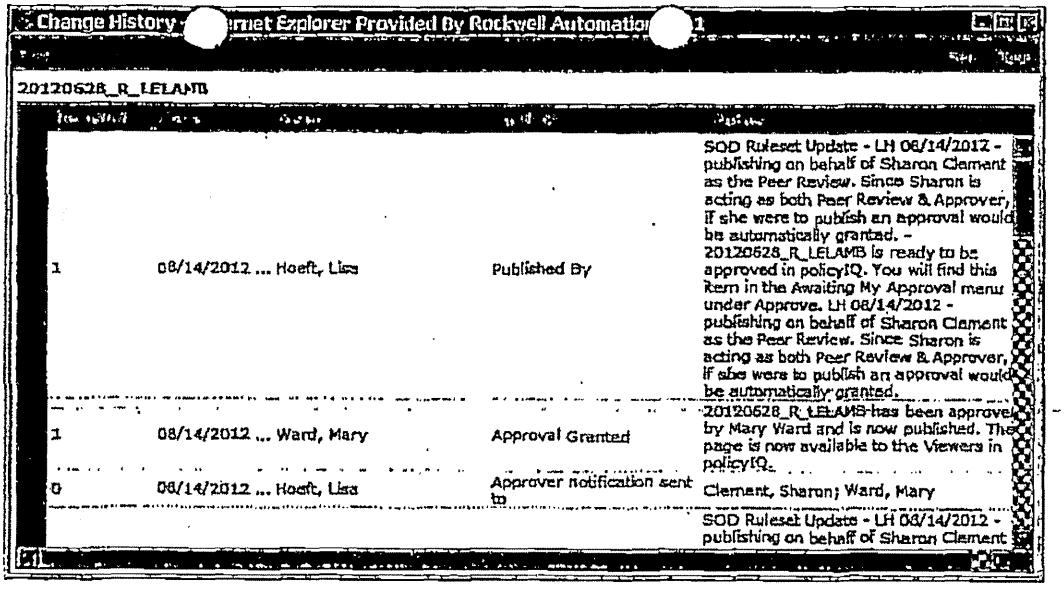
In review of the other attachments in that policyIQ record, when you stopped at my desk on Thursday (Aug 2), you indicated that I had the wrong version of the Corporate IT SOD Matrix which we looked at. However, I'm thinking you

Lisa E Lamb to: Sharon T Clement
Cc: Mary E Ward
08/13/2012 08:36 PM
Show Details

The description should read: The reason for this change was to modify (enable or disable) 11 IT risk to align with the IT Corporate SOD matrix. The discrepancy was found by IT Internal Audit. Details of the changes and justification are in the attached GRC IT SOD conflict analysis 6-15-2012 spreadsheet.

It would only be appropriate to state the description like this (above) when there are numerous changes involved. You can look at Lisa, Darshan or Randy's PolicyIQ entries to assist you with your description details.
I cut and pasted your verbiage into the change log. Thanks. Also did a check-in on the change log. Both you and Mary should receive notification on that. In the future, perhaps it would make sense for you to provide the Descriptios of your changes and how you want them to read when you send me the documents you want checked into PolicyIQ. Since you're most familiar with the changes, you can best describe them. Just a thought.
Also, perhaps a final review of some sort with both Audit and Mary prior to that being published might have made sense to ensure everyone in agreement and that nothing was overlooked. Do you know if there's procedure that Audit wants followed when changes like this are made? Just wondering.

Sharon asked Lisa Hoeft to Publish the RAR Change Log in Policy IQ.
[redacted] asked Mary Ward **why Sharon was allowed to be Peer Reviewer and Approver for a Change she initiated because it violated the change management procedures.**
[redacted] was simply told by Mary to publish the change log and Mary Ward approved.


Change History - ...rnet Explorer Provided By Rockwell Automation ...1

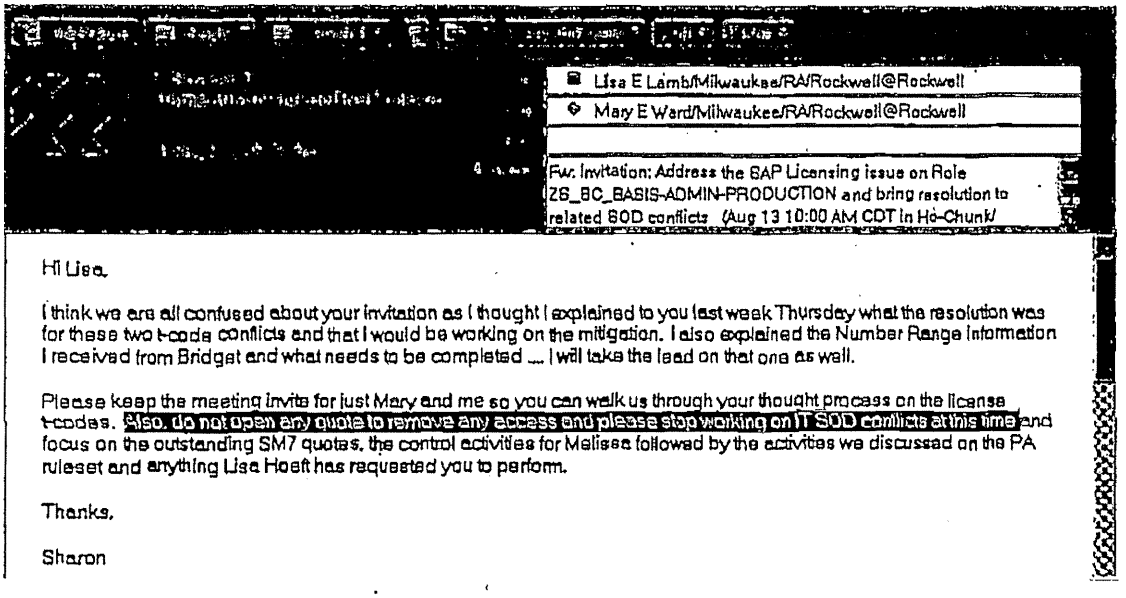
20120628_R_LELAMB

1	08/14/2012 ... Hoeft, Lisa	Published By	SOD Ruleset Update - LH 08/14/2012 - publishing on behalf of Sharon Clement as the Peer Review. Since Sharon is acting as both Peer Review & Approver, if she were to publish an approval would be automatically granted. - 20120628_R_LELAMB is ready to be approved in policyIQ. You will find this item in the Awaiting My Approval menu under Approve. LH 08/14/2012 - publishing on behalf of Sharon Clement as the Peer Review. Since Sharon is acting as both Peer Review & Approver, if she were to publish an approval would be automatically granted.
1	08/14/2012 ... Ward, Mary	Approval Granted	20120628_R_LELAMB has been approved by Mary Ward and is now published. The page is now available to the Viewers in policyIQ.
0	08/14/2012 ... Hoeft, Lisa	Approver notification sent to	Clement, Sharon; Ward, Mary
			SOD Ruleset Update - LH 08/14/2012 - publishing on behalf of Sharon Clement

Around that time, Sharon told me to stop working on the resolution to properly resolve the SAP SOD by removing the license t-code from BASIS roles even after I provided approval to proceed.

I was able to work with IT "under the radar". The Basis roles were changed and the number of SOD conflicts dropped dramatically to just 1008.

I guess there is some good news in all of this!


Lisa E Lamb/Milwaukee/RA/Rockwell@Rockwell

Mary E Ward/Milwaukee/RA/Rockwell@Rockwell

Fw: Invitation: Address the SAP Licensing issue on Role ZS_BC_BASIS-ADMIN-PRODUCTION and bring resolution to related SOD conflicts (Aug 13 10:00 AM CDT in Ho-Chunk/

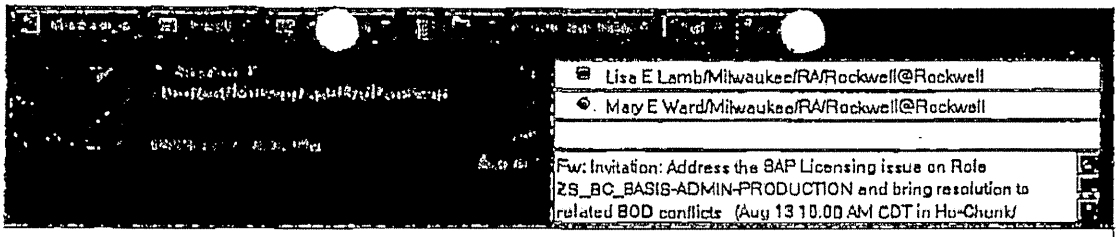
Hi Lisa,

I think we are all confused about your invitation as I thought I explained to you last week Thursday what the resolution was for these two t-code conflicts and that I would be working on the mitigation. I also explained the Number Range information I received from Bridget and what needs to be completed ... I will take the lead on that one as well.

Please keep the meeting invite for just Mary and me so you can walk us through your thought process on the license t-codes. Also, do not open any quote to remove any access and please stop working on IT SOD conflicts at this time and focus on the outstanding SM7 quotes, the control activities for Melissa followed by the activities we discussed on the PA ruleset and anything Lisa Hoeft has requested you to perform.

Thanks,

Sharon



From: Mahmood Z Khan/Milwaukee/RA/Rockwell
To: Lisa E Lamb/Milwaukee/RA/Rockwell@Rockwell
Cc: Sharon T Clement/Milwaukee/RA/Rockwell@Rockwell
Date: 08/08/2012 04:02 PM
Subject: Fw: Invitation: Address the SAP Licensing issue on Role ZS_BC_BASIS-ADMIN-PRODUCTION and bring resolution to related BOD conflicts (Aug 13 10:00 AM CDT in Ho-Chunk/CorporateRestrictedRooms@Rockwell)

Do we really need another meeting on this ?

Questions: when are these license applied, potential outage, is there always a CCR, is the activity logged etc
SLICENSE : These licenses are applied when either the hardware is changes or when we apply patches to the system. Most of these activities have corresponding CCR.
These t-code is for system / application licenses.

SLICENSE_ADMIN - is primarily used by Security team. If you need this t-code removed from basis role that would be fine with me.

Regards